



500 Fifth Avenue, 40th Floor
New York, NY 10110
tel: 212-257-4880
fax: 212-202-6417

www.shapiroarato.com

Alexandra A.E. Shapiro
ashapiro@shapiroarato.com
Direct: 212-257-4881

March 31, 2015

VIA CM/ECF

The Hon. Richard J. Sullivan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Zvi Goffer et al.*, No. 10 Cr. 56 (RJS)

Dear Judge Sullivan:

I represent defendant Michael Kimelman in the above-captioned case. On March 12, 2015, Mr. Kimelman filed his Motion Pursuant to 28 U.S.C. § 2255 to Vacate His Conviction and Sentence, including his memorandum of law in support of the motion. I write to respectfully request that the Court issue a scheduling order for completion of the parties' briefing on Mr. Kimelman's motion.

After consulting with AUSA Brian Blais, who is representing the government in this case, we have agreed to jointly propose the following schedule for the Court's consideration: the government's response to be filed by May 4, 2015, and Mr. Kimelman's reply to be filed by May 18, 2015.

Thank you for your consideration of this request.

Very truly yours,

s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro

cc: AUSA Brian Blais (via CM/ECF)